November 30, 2001

Ms Mary Humphreys
Office of the Administrator
CSREES, US Department of Agriculture
Mail Stop 2201
1400 Independence Avenue, S.W.
Washington, D.C. 20250-2201

(Email: mhumphreys@reeusda.gov)

Dear Ms Humphreys:

The American Dietetic Association (ADA) thanks you for the opportunity to provide comments to help establish priorities for the Cooperative State Research, Education, and Extension Service (CREES). As the largest association of food and nutrition professionals in the United States and a significant stakeholder for CSREES efforts, ADA focuses particularly on the area of human nutrition and food safety. ADA represents more than 68,000 members working in a diverse arena of food, nutrition and health services. The organization is renowned for its grounding in sound science and its expertise in translating science into information that consumers can understand and apply to improve their nutritional health.

We are pleased with CSREES' progress in the Initiative for Future Agriculture and Food Systems, especially research funded under Program 12, Food Safety and Role of Nutrition in Health. Of particular interest to our members was the inclusion of behavior research such as the research on behavioral interventions to improve bone health of adolescents, and WIN in the Rockies which targets healthy behaviors through community based programs.

We also would offer these views for future research.

- 1. ADA recommends that future research identify the health benefits of consuming foods as they fit into dietary patterns such as the Dietary Pyramid. While it is important to evaluate individual food products for the nutrients contained, there is greater value to the public in understanding the context in which these and other foods are consumed -- in other words, within the whole food product and as a total diet. In particular, the following questions are of interest:
 - What consumer messages/interventions are effective in eliciting consumer behavior consistent with the Dietary Pyramid?
 - What consumer messages/interventions are effective in clearly identifying the quantity of foods to be consumed (confusion between portion sizes of Pyramid, label, and common use).
 - How can consumer messages most effectively be delivered to targeted populations (incorporating telemedicine and newer communication strategies in addition to traditional intervention methods)
 - What is the role of various food products and dietary patterns in diets that achieve desirable caloric balance and/or promote healthful weight loss? Research is needed identify long-term health effects of popular weight loss diets that eliminate complete categories of foods, as opposed to the balanced approach based on variety and moderation.
 - What type of consumer information is needed to effectively link the product development, marketing, and optimal consumer intake for functional foods and nutraceuticals (in particular those developed from agriculture products). What is the best regulatory, educational, and marketing strategy that will "link agriculture, nutrition and health" based on sound science. How do we convey "optimal" so that the consumer doesn't simply hear "more is better?"
- 2. We recommend continued focus to advance research in the human genome as it relates to dietary intake. For example, a given

nutrient or dietary pattern may reduce risk for one chronic disease but increase risk of a different chronic disease. In addition to research identifying these connections, it is critical that we research what consumers will hear and when will they dismiss information when it is conflicting.

- 3. The continued safety of the food supply must be a top priority. In addition to the research on effective methods of assuring the food safety, equal attention must be devoted to developing effective messages and consumer education to convey this to the public.
- 4. With increasing focus on identifying outcomes of federally funded programs the importance of the nutrition monitoring research is critical. Greater attention and additional resources should be committed to nutrition monitoring research. ADA recommends that nutrition monitoring research adequately address diet and health knowledge. Maintenance of key aspects of CSFII will be critical to track and understand trends in consumer behavior and nutritional content of the diet of the American public and targeted high risk populations. Nutrition monitoring data will be critical to future evaluations of the desirability of fortification.
- 5. Programatic outcome evaluation must continue to evolve to address impact of nutrition components of the program. It will be critical to effectively characterize the nature of the nutrition education/intervention/therapy as well as capture the resulting outcome. With the lines becoming increasingly blurred between nutrition education (general information for the public) and medical nutrition therapy (specific dietary plan tailored for an individual through Medical Nutrition Therapy) it is critical to maintain close collaboration with other agencies traditionally conducting disease specific research (such as NIH). The USDA research portfolio must address this health issue in partnership with the National Institutes of Health. Clearly the connection between diet and health has never been more important to the nation.
- 6. Finally, we believe there is overwhelming need for research to support consumer messages that promote healthful eating

according to the Dietary Pyramid and the U.S. Dietary Guidelines. In dire need of specific research are:

- Obesity
- Food portions
- Behavior change strategies leading to consumers following the Dietary Pyramid
- Understanding of functional foods and they fit into overall dietary patterns (to include maximum safe levels)

The American Dietetic Association is a strong advocate for increased food, nutrition and agricultural research funding. Our members -- as researchers and practitioners -- are key stakeholders of USDA research. We look forward to future involvement in helping set the nation's food and agricultural research agenda, as well as disseminating research results. In addition, we recognize the vital role the Extension Service can play in disseminating those messages to the consumer. As a member of National CFAR, we continue to advocate for a doubling of funds for food and agricultural research over the next five years.

Thank you for the opportunity to provide written comments regarding the priorities of CSREES in these subject areas. If we may provide additional information please contact me at 312/899-4860.

Sincerely,

Esther Myers, PhD, RD, FADA American Dietetic Association Director, Scientific Affairs and Research